KHAI LEQUANG (STATE BAR NO. 202922)
klequang@orrick.com
ABIGAIL W. LLOYD (STATE BAR NO. 243971)
alloyd@orrick.com
GEOFFREY MOSS (STATE BAR NO. 258827)
gmoss@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
2050 Main Street, Suite 1100
Irvine, CA 92614-8255
Telephone: +1 949 567 6700
Facsimile: +1 949 567 6710

Attorneys for Plaintiffs
EFG Bank AG, CAYMAN BRANCH; WELLS FARGO BANK, NATIONAL ASSOCIATION, as securities intermediary for EFG BANK AG, CAYMAN BRANCH; DLP MASTER TRUST; DLP MASTER TRUST II; GWG DLP MASTER TRUST; AND GREENWICH SETTLEMENTS MASTER TRUST

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

EFG Bank AG, CAYMAN BRANCH; WELLS FARGO BANK, NATIONAL ASSOCIATION, as securities intermediary for EFG BANK AG, CAYMAN BRANCH; DLP MASTER TRUST; DLP MASTER TRUST II; GWG DLP MASTER TRUST; AND GREENWICH SETTLEMENTS MASTER TRUST, Plaintiffs, v. THE LINCOLN NATIONAL LIFE INSURANCE COMPANY, Defendant.	Case No. 2:17-cv-00817-JFW-KS **DECLARATION OF KHAI LEQUANG IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT THE LINCOLN NATIONAL LIFE INSURANCE COMPANY'S MOTION TO TRANSFER VENUE** Date: June 12, 2017 Time: 1:30 p.m. Dept: Courtroom 7A Judge: Hon. John F. Walter

DECLARATION OF KHAI LEQUANG

I, Khai LeQuang, declare and state as follows:

1. I am an active member of the State Bar of California, admitted to practice before this Court, and a partner with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel for Plaintiffs EFG Bank AG, Cayman Branch ("EFG") and Wells Fargo Bank, National Association ("Wells Fargo"), as securities intermediary for EFG (EFG and Wells Fargo together, "EFG Plaintiffs'), and Plaintiffs DLP Master Trust, DLP Master Trust II, GWG DLP Master Trust, and Greenwich Settlements Master Trust (collectively, "EAA Plaintiffs," and together with EFG Plaintiffs, "Plaintiffs"). I have personal knowledge of the facts declared herein and could testify truthfully thereto if so required.

2. I submit this declaration in support of Plaintiffs' Opposition to Defendant The Lincoln National Life Insurance Company's ("Lincoln") Motion to Transfer Venue to the Eastern District of Pennsylvania.

3. Attached hereto as **Exhibit A** is a true and correct copy of a company profile page on Lincoln that is accessible through the California Department of Insurance's website.

4. Attached hereto as **Exhibit B** is a true and correct copy of a company profile page on Jefferson-Pilot Life Insurance Company ("Jefferson-Pilot") that is accessible through the California Department of Insurance's website.

5. Attached hereto as **Exhibit C** are true and correct copies, redacted for privacy, of cover pages of Lincoln policy illustrations for the 39 policies at issue in this action. The state where the policy was issued has been highlighted.

6. Attached hereto as **Exhibit D** are true and correct copies of excerpts of three policies that are currently at issue in this action. The excerpts include the policy applications, which have been redacted for privacy, except to show the city and state of the original owner.

7. Attached hereto as **Exhibit E** is a true and correct copy of a

Consolidated Class Action Complaint ("CCAC") filed on April 19, 2017 in the Eastern District of Pennsylvania, *In re: Lincoln COI Litigation*, Case No. 2:16-cv-06605-GJP (ECF No. 30).

8. Attached hereto as **Exhibit F** is a true and correct copy of a Joint Motion to Exceed Page Limits and Set Briefing Schedule filed on May 2, 2017 in the Eastern District of Pennsylvania, *In re: Lincoln COI Litigation*, Case No. 2:16-cv-06605-GJP (ECF No. 33).

9. Attached hereto as **Exhibit G** is an Order entered on May 5, 2017 in the Eastern District of Pennsylvania, *In re: Lincoln COI Litigation*, Case No. 2:16-cv-06605-GJP (ECF No. 36).

10. Attached hereto as **Exhibit H** is a true and correct copy of the Eastern District of Pennsylvania docket report, as of May 18, 2017, for *In re: Lincoln COI Litigation*, Case No. 2:16-cv-6605-GJP (E.D. Penn.).

11. Attached hereto as **Exhibit I** is a true and correct copy of a company profile page for Lincoln from the California Secretary of State's website.

12. Attached hereto as **Exhibit J** is a true and correct copy of a search report from the Courthouse News Service, which is a legal resource and news service subscription, indicating that since 2003, Lincoln has been named as a defendant in at least 200 federal and state court cases in California.

13. Attached hereto as **Exhibit K** is a true and correct copy of a search report from the Courthouse News Service indicating that since 2008, Lincoln has filed 16 lawsuits in federal and state courts in California.

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

14. Orrick, Herrington & Sutcliffe LLP does not have an office in Philadelphia or anywhere else in Pennsylvania.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed May 18, 2017, at Irvine, California.

/s/ Khai LeQuang
Khai LeQuang